IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

DEUTSCHE BANK TRUST COMPANY :

AMERICAS, in its capacity as successor : indenture trustee for certain series of Senior :

Notes, et al.,

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Plaintiffs, : C.A. No. 11-618-GMS

:

v.

:

SOWOOD ALPHA FUND LP, et al.,

:

Defendants.

DEFENDANT ROCCA LIMITED LIABILITY CO.'S RULE 7.1 STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable judges and magistrate judges of the Court to evaluate possible disqualification and recusal, the undersigned attorneys of record for Defendant Rocca Limited Liability Co. ("Rocca") certify that Rocca has no parent, subsidiary or affiliate corporations, and no publicly-held corporation holds 10% or more of Rocca's interests.

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Dated: October 19, 2011 Attorneys for Defendant Rocca

Limited Liability Co.